
From: William Young[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6A5461F478F74A9DAD9E944FE30CAF5F-WILLIAM YOU]
Sent: Wed 7/29/2020 3:17:23 PM (UTC)
To: Sydney Friedopfer[faithfamilyfreedomtn@gmail.com]
Cc: Lance Frizzell[Lance.Frizzell@tn.gov]
Subject: RE: [EXTERNAL] Faith Family Freedom PAC - Appointment Of Political Treasurer Form

Ms. Friedopfer—We appreciate your response to our inquiry. Bill

Bill Young
Executive Director, Bureau of Ethics and Campaign Finance
404 James Robertson Pkwy., Suite 104
Nashville, TN 37243
615-741-7959

From: Sydney Friedopfer <faithfamilyfreedomtn@gmail.com>
Sent: Tuesday, July 28, 2020 2:01 PM
To: William Young <William.Young@tn.gov>
Cc: Lance Frizzell <Lance.Frizzell@tn.gov>
Subject: Fwd: [EXTERNAL] Faith Family Freedom PAC - Appointment Of Political Treasurer Form

Bill and Lance,

Please see below for all communication regarding the Faith Family Freedom Fund. This includes the most recent email to Janet Williams concerning the false story from News Channel 5.

Please let me know if you have any questions, or if you'd like us to send over bank statements reflecting the situation discussed below.

Thank you,

Sydney

----- Forwarded message -----

From: **Sydney Friedopfer** <faithfamilyfreedomtn@gmail.com>
Date: Wed, Jul 15, 2020 at 8:40 AM
Subject: Re: [EXTERNAL] Faith Family Freedom PAC - Appointment Of Political Treasurer Form
To: Janet Williams <Janet.Williams@tn.gov>

Janet,

We have been made aware of a story from a Nashville reporter that claims we are somehow operating illegally in Tennessee.

While the story is filled with inaccuracies, one claim in particular states we incorrectly filed our most recent disclosure.

The way I understand it, the 2nd Quarter disclosure covers the period of April 1 - June 30.

We deposited our first donation on July 9 (the check was dated July 1), and were billed for the first time by a vendor we use for services on July 11.

Since both the check was dated after June 30th, deposited after June 30th, and we were billed for the first time after June 30th, our 2nd Quarter disclosure shows no activity. These items will be reported on our Pre-Primary disclosure.

If I am misinterpreting the guidelines in Tennessee, please let me know, and we will be happy to correct any errors.

Thank you for your time.

Sydney

On Thu, Jan 9, 2020 at 2:18 PM Sydney Friedopfer <faithfamilyfreedomtn@gmail.com> wrote:
Thanks so much! It is officially in the mail to you.

Very appreciated,

-Sydney

On Thu, Jan 9, 2020 at 1:40 PM Janet Williams <Janet.Williams@tn.gov> wrote:
As long as you have put the original in the mail to us, you are good to go! We don't need anything further.

Janet Williams
Chief of Staff/Compliance Officer
Bureau of Ethics and Campaign Finance
404 James Robertson Pkwy., Suite 104
Nashville, TN 37243
615-741-7959

From: Sydney Friedopfer <faithfamilyfreedomtn@gmail.com>
Sent: Thursday, January 9, 2020 12:28 PM
To: Janet Williams <Janet.Williams@tn.gov>
Subject: Re: [EXTERNAL] Faith Family Freedom PAC - Appointment Of Political Treasurer Form

Thank you, Janet!

Attached is the updated form.

Is there anything else you need from this end?

On Thu, Jan 9, 2020 at 11:36 AM Janet Williams <Janet.Williams@tn.gov> wrote:
Hi Sydney,

The "Appointing Authority" needs to be signed by someone within the organization that can verify the treasurer.

And, you are correct, we are not collecting the \$100 PAC fee at this time.

If you have any other questions, just let me know.

Thanks,
Janet

Janet Williams
Chief of Staff/Compliance Officer
Bureau of Ethics and Campaign Finance
404 James Robertson Pkwy., Suite 104
Nashville, TN 37243
615-741-7959

From: Sydney Friedopfer <faithfamilyfreedomtn@gmail.com>
Sent: Thursday, January 9, 2020 10:57 AM
To: Janet Williams <Janet.Williams@tn.gov>
Subject: [EXTERNAL] Faith Family Freedom PAC - Appointment Of Political Treasurer Form

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Hi Janet,

We spoke earlier this morning about setting up a PAC in Tennessee with me being out of state. I appreciate your help very much!

I have attached the Appointment of Political Treasurer Form here. For the "Appointing Authority" signature, I wasn't sure if that was on this end or yours once you receive the form. If that is something I need to have signed on this end, please let me know.

If you can help process this for me, I would be very grateful. I can drop the original in the mail today as well.

Also, just to confirm, you mentioned the \$100 filing fee that is currently not being collected. To be clear, I do not need to include a check for \$100 in the envelope with the political treasurer form, correct?

Thank you again for all of your help.

Sincerely,

Sydney

STATE OF TENNESSEE



BUREAU OF ETHICS AND CAMPAIGN FINANCE REGISTRY OF ELECTION FINANCE

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Henry Fincher
William J. (Paz) Haynes, III
Tom Lawless
Tom Morton

May 10, 2021

Faith Family Freedom Fund
C/O Sydney Friedopfer
4043 Riverdale Rd., #1022
Ogden, UT 84405

**SENT CERTIFIED MAIL, RETURN RECEIPT REQUESTED AND VIA EMAIL TO
Sydney Friedopfer <faithfamilyfreedomtn@gmail.com>**

Dear Treasurer:

At its April 14, 2021 meeting, the Registry of Election Finance ("the Registry") voted to investigate/audit several specific transactions related to Faith Family Freedom Fund (hereinafter referred to as "PAC") and its' campaign finance activity during the 2020 election cycle. This action is based on the Registry's authority pursuant to T.C.A. §§ 2-10-207(1), 2-10-206(a)(7) and 2-10-207(a)(10).

The objectives of the audit are to determine the PAC's compliance with campaign finance disclosure laws and regulations and compliance with campaign contribution limits laws and regulations. In addition, the audit will determine the accuracy, completeness, and timeliness of disclosures on the PAC's campaign finance disclosure statements, including itemized statements of contributions, in-kind contributions, expenditures, obligations, and loans for the 2020 election and specifically the **2020 Pre-Primary** reporting period. The audit will examine each of the following to determine compliance:

1. All receipts received were reported to the Registry, reported in the proper period, reported in compliance with Tennessee Code Annotated (T.C.A.) Section 2-10-105 and Section 2-10-107, and reported in compliance with the Registry's rules.
2. All contributions are supported by bank statements and deposit slips.
3. All disbursements and obligations were reported to the Registry, reported in the proper period, reported in compliance with T.C.A. §§2-10-107 and 2-10-114, and reported in compliance with the Registry's rules.

4. Disbursements and obligations are supported by canceled checks and bank statements.
5. The completeness of PAC records to support the disclosures made and to determine compliance with campaign finance disclosure laws and campaign contribution limits laws.
6. Bookkeeping and other disclosures data is reported and maintained as prescribed by campaign finance laws and the Registry's rules.

Upon completion of the audit test work, an audit report will be prepared. The report will be submitted to the Registry Board Members for their consideration. The Registry will then approve the audit without further consideration or issue show-cause notices for the PAC's response. Finally, in accordance with T.C.A. §2-10-212 (f) upon completion and approval of the audit by the Registry the report will be posted to the Registry's website.

We will require assistance directly from the PAC's Appointing Authority, the PAC's Officers, and the PAC's treasurer during the course of our work, including providing the information and documentation as outlined on the Audit Documentation List enclosed with this letter. During the audit, you will be asked to answer relevant questions or provide explanations to issues encountered. In addition, you will be asked to certify that certain disclosures made, and information provided is complete and accurate. We appreciate your commitment in providing the necessary information in a timely manner so that we may complete our audit promptly. We hope to conduct our audits in the most efficient manner as possible, while limiting the intrusion into the busy schedules of the PAC officials and their treasurers.

In connection with an investigation, the Registry has the power to hold hearings, conduct audits, subpoena witnesses, administer oaths, and compel production of books, correspondence, papers, and other records. T.C.A. § 2-10-207(1). As a consequence of this investigation you are obligated to comply with T.C.A. § 2-10-105(f) which reads as follows:

"All records used by the candidate or political campaign committee to complete a statement required by this part shall be retained by the candidate or political campaign committee for at least two (2) years after the date of the election to which the records refer or the date of the statement, whichever is later. After the two-year period, the candidate or political campaign committee is authorized to destroy such records, absent any pending investigation by the registry of election finance or any other law enforcement agency, or absent any administrative or court proceeding. Once an investigation is closed by the registry of election finance, records may be destroyed upon a petition for approval to the registry of election finance." (Emphasis added).

This letter shall serve as notice that you must retain all records associated with the PAC's 2020 campaign activity until such time as both this investigation is completed, and the statutory requirements are met as outlined above.

Please be aware that failure to comply with an audit investigation is a Class 2 offense as defined in T.C.A. § 2-10-110(a)(2) pursuant to T.C.A. § 2-10-212(g). A Class 2 offense is punishable by a maximum civil penalty of not more than ten thousand dollars (\$10,000) or fifteen percent (15%) of the amount in controversy, if fifteen percent (15%) of the amount in controversy is greater than ten thousand dollars (\$10,000). Furthermore, pursuant to T.C.A. 2-10-110(f)(1), the PAC's treasurer is personally liable for any civil penalty assessed against the PAC.

If you have any questions or concerns during the course of the audit or related to your responsibilities in the audit process, please contact our Office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lauren Topping".

Lauren Topping
General Counsel
Bureau of Ethics and Campaign Finance
404 James Robertson Pkwy., Suite 104
Nashville, TN 37243
Lauren.Topping@tn.gov
615-253-5370

Enclosure (1)

2020 Elections Audit Documentation List

The following list of documents outlines documents that the Registry of Election Finance is requesting in order to perform a limited audit of Faith Family Freedom Fund's campaign financial disclosure reports. These documents should be provided to the Registry no later than **May 21, 2021**. This list is intended to serve as a guide for producing commonly available and helpful records, however, the Faith Family Freedom Fund is requested to provide any records in its possession or available to it to support the disclosures made by the organization in order to complete the audit. This list does not constitute a complete list of all items that may be requested during the course of the audit, but these documents will allow us to begin the audit process.

1. A listing of all bank accounts used by Faith Family Freedom Fund. This list should show the name of the bank and the bank account number. Included on this list should be any financial entities or accounts that held or disbursed funds associated to Faith Family Freedom activity from January 1, 2020 to January 15, 2021.
2. All Faith Family Freedom Fund bank account statements for the accounts listed in item 1, including cancelled checks for the period of June 1, 2020 to August 30, 2020. The statements should include all activity disclosed on the 2020 Pre-Primary report listed in the audit notice. If you are aware of transactions on reports prior to 6/1/2020 or subsequent to 8/30/2020, you should provide those statements. If you do not have the bank statements for any period listed above, please obtain the statements from your bank(s). If you choose not to obtain these records from your bank(s), the Registry may issue subpoenas to each bank to obtain this documentation.
3. Copies of all deposit slips retained from June 1, 2020 to August 30, 2020.
4. Any and all retained copies of donor checks, donor cards, contribution lists, and/or any other supporting documentation for contributions relating to contributions received from June 1, 2020 to August 30, 2020. Any records retained by the Faith Family Freedom Fund to identify contribution amounts, donor addresses, donor occupations, and donor employers during this time period.
5. Any and all copies of receipts, vendor invoices, billing statements, cancelled checks, and/or any other supporting documentation for disbursements made by the Faith Family Freedom Fund from June 1, 2020 to August 30, 2020.
6. Documentation of any Faith Family Freedom Fund bank account reconciliations performed and/or reconciliation of campaign disclosure statements to bank and financial records.
7. Any and all records used by the Faith Family Freedom Fund, its treasurer, or any employee of the Faith Family Freedom Fund to prepare the 2020 Pre-Primary

campaign finance reports listed in the audit notice should be included in the records provided.

8. The documentation provided should also include support to show services were received. As the disbursements reported on the 2020 Pre-Primary report appears to be media or media related, for each transaction copies of the media produced should also be provided. This can include mailers produced, social media advertisements prepared, time purchased, preliminary mockup(s), and/or scripts. If such items were not maintained by the Faith Family Freedom Fund, you may also be able to contact the vendor to get copies actual ads or mockups (photo ready ad), scripts, or other ad documents they prepared, including purchases of time and space to run radio, TV or online ads. Please also indicate which records relate to which payments disclosed.